

**ADDENDUM TO THE FACT SHEET FOR STATE WASTE
DISCHARGE PERMIT NO. ST-7349**

I. GENERAL INFORMATION

Facility: Icicle Seafoods, Inc. (Surimi Division)
 500 Orchard Drive
 Bellingham, WA 98225

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (the Department) on September 25, 2003, and accepted by the Department on November 17, 2003. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to ensure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in Chapter 173-216 WAC.

The application for Icicle Seafoods (Surimi Division) was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the permit, which is to be reauthorized to Icicle Seafoods (Surimi Division) for the discharge of wastewater to the City of Bellingham Wastewater Treatment Plant. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1999.

Since the issuance of the current permit, the Department has not received any information regarding environmental impacts from the discharge that were not already evaluated at the time of the last permit issuance, persuasive enough to undertake a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on March 24, 1999.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be reissued for five years.